

Phyllis A. Whitten
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(202) 550-0722
(301) 270-2271

August 14, 2006

Via E-Mail

Vickie Robinson, Esq.
Gina Spade, Esq.
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Docket 96-45, Pine Belt Cellular, Inc.'s Petitions for Waiver and associated
USAC Letter of Appeal

Dear Ms. Robinson and Ms. Spade:

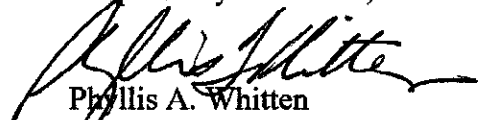
Transmitted along with this letter is a Letter of Appeal I filed with USAC via e-mail on August 11, 2006 on behalf of Pine Belt Cellular, Inc. ("Pine Belt").

The Letter of Appeals was filed in response to a collection letter USAC mailed to Pine Belt on July 12, 2006 demanding payment of a disbursement adjustment invoice within 30 days. Pine Belt believes that this disbursement adjustment invoice and collection activity is related to matters addressed in the two Pine Belt Petitions for Waiver currently pending in this Docket, and therefore supplies this Letter of Appeal for the record in both proceedings.

By filing the Letter of Appeal with USAC, Pine Belt seeks to have further discussions with USAC about the invoice and allow the FCC further time to act on its Petitions for Waiver.

Thank you for your assistance in this matter. Please contact me you have questions or need further information.

Respectfully submitted,


Phyllis A. Whitten
Counsel to Pine Belt Cellular, Inc.

Copy to Thomas Buckley, Esq.

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August 11, 2006

Via U.S. Mail and by E-Mail to hcfilings@hcli.universalservice.org

Letter of Appeal
High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Re: Disbursement Adjustment Invoice, Pine Belt Cellular, Inc.
Spin Number 123000809

Dear USAC:

This letter of appeal is submitted to you in connection with your letter dated July 12, 2006 ("Collection Letter") mailed to Pine Belt Cellular, Inc. (hereafter "Pine Belt" or "the Company"). Pine Belt received the letter via U.S. Post Office mail on July 17, 2006. The letter referenced a past due balance and demanded payment within 30 days.

Pine Belt respectfully requests additional time to confer with USAC and FCC personnel about this matter for the reasons explained below. Apparently the invoice that is the subject of the Collection Letter is invoice number NGH0000000233 entitled "Disbursement Adjustment Invoice" reflecting a high cost disbursement adjustment charge of \$10,074.00.

Although the invoice is dated September 15, 2005, and the letter states that the entire account balance was due on October 14, 2005, this invoice was not received by Pine Belt until July 27, 2006. Pine Belt personnel received this invoice ten days after it received the Collection Letter, and only after calling USAC on July 17, 2006 (the same day it received the letter) and requesting a copy of the invoice. USAC was requested to send a copy of the invoice to Pine Belt via facsimile, but no copy of the invoice was received until a second call was placed by Pine Belt on July 27, 2007, when a USAC staffer named Sandra transmitted a facsimile copy of the invoice to Pine Belt. After receipt of the invoice on July 27, 2006, Pine Belt transmitted the letter to its outside accounting and legal experts. Pine Belt's outside accountant placed a call in late July to USAC, and eventually had a telephone conversation with a USAC staffer named Elizabeth on or about August 7, 2006. Based on this conversation, Pine Belt now believes that this matter may relate to two pending waiver petitions at the FCC.

Letter of Appeal to USAC
Page Two

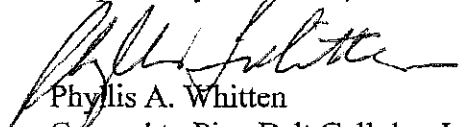
As Pine Belt explains in two Petitions for Waiver pending at the FCC (these petitions were served on USAC, and also are mailed along with this Letter of Appeal) it has experienced some filing deadline difficulties in relation both to the after effects of Hurricane Ivan (a pre-Katrina hurricane that caused power outages, flooding and property damage in its region of Alabama), and other hardships and misunderstandings. One of Pine Belt's Petitions has been on file at the FCC for a year and a half, and the other one was filed more recently after Pine Belt requested its outside legal and accounting experts to conduct a more thorough review of USAC filings and payments.

Therefore, Pine Belt would appreciate the time and opportunity to work with its legal and accounting experts and have further conversations with USAC and the FCC to resolve this matter. Because Pine Belt only recently received the invoice, and the invoice itself contains no explanation of how USAC performed the adjusted disbursement amount, Pine Belt has not yet had sufficient time and opportunity to request or review any records that pertain to this collection matter, nor has it had sufficient time or opportunity to discuss entering into a written repayment agreement. Pine Belt has not previously been given the opportunity to request documents with respect to this invoice, and maintains the legal position that it has not waived any of its rights to request information or engage in further discussions with USAC and FCC staff.

At this point, Pine Belt respectfully submits that referral of this matter to the FCC for collection action would be premature, an inefficient use of the resources of USAC, the FCC and Company personnel. Therefore, Pine Belt respectfully requests that USAC defer collection action on this invoice until Pine Belt has a better opportunity to work through the issues with USAC and FCC staff.

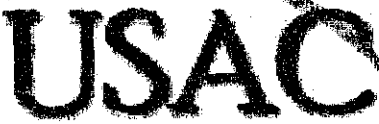
Thank you for your consideration of this matter. If you have questions or need further information, please contact me.

Respectfully submitted,



Phyllis A. Whitten
Counsel to Pine Belt Cellular, Inc.

Enclosures (By U.S. Mail)
USAC July 12, 2006 Letter
Invoice number NGHC0000000233
Pine Belt's two FCC Petitions for Waiver



Universal Service Administrative Company

Collections Department
For billing inquiries call (888) 641-8722

July 12, 2006

Pine Belt Cellular Inc

Attn: Jean Creswell

3984 CO RD 32 P.O. Box 279

Arlington AL 36722-0279

Re: SPIN Number 143000809

High Cost Negative Disbursement
9-15-05

opt 3 the
opt 1

Dear Service Provider,

As of 6/30/2006, our records indicate we have not received a payment for your entire account balance that was due 10/14/2005. The portion of your account balance that is now over 90 days past due totals \$10,074.00.

THE FOLLOWING PROVISIONS CONTAIN IMPORTANT INFORMATION AND A
DESCRIPTION OF LEGAL RIGHTS, OBLIGATIONS, AND OPPORTUNITIES.
FIRST NOTICE-DELINQUENT ACCOUNT

1. Debtor is cautioned that its continued failure to make the demanded payment will result in further sanctions, including, but not limited to, the initiation of proceedings to recover the outstanding debt, together with any applicable administrative charges, penalties, and interest pursuant to the provisions of the Debt Collection Act of 1982 (Public Law 97-365) and the Debt Collection Improvement Act of 1996 (Public Law 104-134), as amended (the DCIA), as set forth below.
2. If we do not receive full payment within 30 days from the date of this letter (Demand Date), pursuant to the DCIA, we will transfer the full amount of the outstanding debt to the Federal Communications Commission (Commission or FCC) for debt collection. The FCC has determined that the funds are owed to the United States pursuant to the provisions of 31 USC § 3701 and 47 USC § 254. Because the unpaid amount is a debt owed to the United States, we remind you again that we are required by the DCIA to impose interest and to inform you what may happen if you do not pay the full outstanding debt. Under the DCIA, the United States will charge interest from the date of the first notice, you will be required to pay the administrative costs of processing and handling a delinquent debt as set by the Treasury (currently 18% of the debt), and you will be charged an additional penalty of 6% a year for any part of the debt that is more than 90 days past due. Interest on the outstanding debt (DCIA Interest) will be assessed at the published investment rate for the Treasury tax and loan accounts (Treasury Current Value of Funds Rate). These requirements are set out at 31 U.S.C. § 3717.
3. When we transfer the Debt, you may be subject to other administrative proceedings. Your failure to pay the Debt may be reported to credit bureaus (see 31 USC § 3711(e)), the Debt will be considered for administrative offset (see 31 USC § 3716), the Debt may be further transferred to collection agencies

(see 31 USC §§ 3711, 3718), and also the Debt may be referred to the United States Department of Justice or agency counsel for litigation. In that situation, You may be subject to additional administrative costs that result from the litigation. Moreover, pursuant to 31 USC §3720B, a person owing an outstanding nontax debt that is in delinquent status shall not be eligible for Federal financial assistance. You should be aware that the discharge of any portion of the debt may be reported to the Internal Revenue Service as potential taxable income.

Opportunities of Inspection, Review, and Repayment Agreement Have Been Waived

4. Because you failed to exercise the opportunity to inspect and copy the invoices and other records pertinent to the Debt, or to request that we review the records pertaining to the Debt, including the opportunity to present evidence that all or part of the Debt is not past due or legally enforceable, they have been waived. Moreover, you did not request the opportunity to enter into a written repayment agreement (Promissory Note) to pay the full amount of the Debt. That opportunity is also considered waived.

5. To avoid further charges or the transfer of the Debt, submit your payment by ACH or check as indicated below, or contact us immediately in writing with the date on which you will make payment by mail or facsimile transmission.

To Submit Payment

ACH Payments:

ACH payments should be sent in a CCD+ format to:

ABA Number - 071000505; Bank Account Number 59004563

Please include Service Provider Number (SPIN) and Invoice Number in your ACH

Check Payments:

Please send check payments to:

Universal Service Administrative Company

1259 Payshare Circle

Chicago, IL 60674

Please include Service Provider Number (SPIN) and Invoice Number on your check

USAC Contact Information:

Please direct all correspondence and inquiries to the following address and fax:

USAC Billing Disbursement

2000 L Street, N.W., Suite 200

Washington, DC 20036

Attention: Billing Department

Facsimile # (888) 637-6226

Voice telephone # (888) 641-8722

Please also note that you are required to pay any balances owed to USAC upon receipt of an invoice. If you are awaiting a filing revision to take effect and/or awaiting a decision on an outstanding appeal to USAC, you are still obligated to pay the requisite balance due on your invoice.

Sincerely,

USAC Collections Department



Statement Date: 9/22/2005

Invoice Number: NCHC0000000233

SPIN Number: 143000009

Balance Due USAC: \$10,074.00

Universal Service Administrative Company

Amount Enclosed:

Mail Payment To:

Pine Belt Cellular Inc
3984 CO RD 32, P.O. Box 1130
Selma, AL 36702-1120
Attn: Jean Greenwell

Universal Service Administrative Company
1259 Poyphore Circle
Chicago, IL 60674-1259

Please remit payment for this invoice through a biller or a biller's biller.

Send any portion of payment with payment. Keep bottom portion for your records.

DISBURSEMENT ADJUSTMENT INVOICE

Date	Description	Charges	Credits
9/15/2005	Previous Balance	39.00	
	High Cost Support Mechanism Disbursement Adjustment	\$10,074.00	
	BALANCE DUE USAC ON 10/14/2005	\$10,074.00	

The Balance Due on this Statement represents your mandatory obligation to universal service support and constitutes a Debt owed to the United States as defined by 31 U.S.C. § 3701, the Debt Collection Act of 1990 (Public Law 101-681), and the Debt Collection Improvement Act of 1996 (Public Law 104-134), as amended (the DCIA) and any amendments thereto. This Statement constitutes a demand for payment of the Balance Due in accordance with and pursuant to Federal Communications Regulations (47 C.F.R. § 1.1911) and the DCIA.

9/22/2005	NCHC0000000233	143000009	\$10,074.00
<p align="center">PAYMENT INFORMATION</p> <p align="center">Payment must be received by 10/14/2005 to avoid late payment penalties.</p> <p align="center">Please remit ACH payments in a CCD+ format to ABA 0071000103, Account #3390000000.</p> <p align="center">Please also include your Company Name, SPIN Number, and Invoice Number.</p>			

JUL 27 2006 11:01

Fax: 2027760078

P.02

JUL 27 2006 9:19AM HP LHSRJET 3330